

the loans and to make payments on the loans exceeding the amounts allowed by law and the amounts which the customers were told they were required to pay.

48. It was a part and object of the conspiracy that SCOTT TUCKER and TIMOTHY MUIR, the defendants, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

(Title 18, United States Code, Section 1349.)

**COUNT SIX**  
**(Wire Fraud)**

The Grand Jury further charges:

49. The allegations contained in paragraphs 1 through 34 above are hereby repeated, realleged, and incorporated by reference herein as though fully set forth herein.

50. From at least in or about 2004 up to and including in or about August 2013, in the Southern District of New York and

elsewhere, SCOTT TUCKER and TIMOTHY MUIR, the defendants, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, and by such conduct, did affect a financial institution, to wit, TUCKER and MUIR made material misrepresentations concerning the true cost of payday loans offered by the Tucker Payday Lenders and the identity of the lender offering the loans in order to induce customers to obtain the loans and to make payments on the loans exceeding the amounts allowed by law and the amounts which the customers were told they were required to pay.

(Title 18, United States Code, Sections 1343 and 2.)

**COUNT SEVEN**  
**(Money Laundering Conspiracy)**

The Grand Jury further charges:

51. The allegations contained in paragraphs 1 through 34 above are hereby repeated, realleged, and incorporated by reference herein as though fully set forth herein.

52. From at least in or about 2004 up to and including in or about August 2013, in the Southern District of New York and elsewhere, SCOTT TUCKER and TIMOTHY MUIR, the defendants, and others known and unknown, knowingly and intentionally did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i).

53. It was a part and an object of the conspiracy that SCOTT TUCKER and TIMOTHY MUIR, the defendants, and others known and unknown, in offenses involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions represented proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such financial transactions, which in fact involved the proceeds of specified unlawful activity, to wit, wire fraud, in violation of Title 18, United States Code, Section 1343, with the intent to promote the carrying on of such specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

54. It was a further part and object of the conspiracy that SCOTT TUCKER and TIMOTHY MUIR, the defendants, and others known and unknown, in offenses involving and affecting interstate and foreign commerce, knowing that the property

involved in certain financial transactions represented proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such financial transactions, which in fact involved the proceeds of specified unlawful activity, to wit, wire fraud, in violation of Title 18, United States Code, Section 1343, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Section 1956(h).)

**COUNT EIGHT**  
**(Promotion Money Laundering)**

The Grand Jury further charges:

55. The allegations contained in paragraphs 1 through 34 above are hereby repeated, realleged, and incorporated by reference herein as though fully set forth herein.

56. From at least in or about 2004 up to and including in or about August 2013, in the Southern District of New York and elsewhere, SCOTT TUCKER and TIMOTHY MUIR, the defendants, and others known and unknown, in offenses involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions represented proceeds

of some form of unlawful activity, did conduct and attempt to conduct such financial transactions, which in fact involved the proceeds of specified unlawful activity, to wit, wire fraud, in violation of Title 18, United States Code, Section 1343, with the intent to promote the carrying on of such specified unlawful activity, to wit, TUCKER and MUIR used the proceeds of illegal payday loans to advertise and generate leads for, and to fund, new payday loans to additional customers by the Tucker Payday Lenders.

(Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2.)

**COUNT NINE**  
**(Concealment Money Laundering)**

The Grand Jury further charges:

57. The allegations contained in paragraphs 1 through 34 above are hereby repeated, realleged, and incorporated by reference herein as though fully set forth herein.

58. From at least in or about 2004 up to and including in or about August 2013, in the Southern District of New York and elsewhere, SCOTT TUCKER and TIMOTHY MUIR, the defendants, and others known and unknown, in offenses involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions represented proceeds of some form of unlawful activity, did conduct and attempt to

conduct such financial transactions, which in fact involved the proceeds of specified unlawful activity, to wit, wire fraud, in violation of Title 18, United States Code, Section 1343, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, to wit, TUCKER and MUIR engaged in financial transactions involving the proceeds of illegal payday loans, including various transactions involving nominally tribal entities, in order to conceal their ownership and/or control of the Tucker Payday Lenders, their receipt of proceeds of the illegal loans, and the illegal nature and source of their ill-gotten gains.

(Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.)

**COUNTS TEN THROUGH FOURTEEN**  
**(False TILA Disclosures)**

The Grand Jury further charges:

59. The allegations contained in paragraphs 1 through 34 above are hereby repeated, realleged, and incorporated by reference herein as though fully set forth herein.

60. From at least in or about 2004 through in or about 2012, SCOTT TUCKER and TIMOTHY MUIR, the defendants, and others known and unknown, in the Southern District of New York and

elsewhere, willfully and knowingly gave false and inaccurate information and failed to provide information which they were required to disclose under the Truth in Lending Act, 15 U.S.C. §§ 1601 et seq. and regulations issued thereunder ("TILA"), and used a chart and table authorized by the Bureau of Consumer Financial Protection under 15 U.S.C. § 1606 in such a manner as to consistently understate the annual percentage rate determined under 15 U.S.C. § 1606(a)(1)(A), to wit, the defendants gave customers false and inaccurate information in TILA disclosures that materially understated the true cost of the loans extended by each of the Tucker Payday Lenders set forth below:

Count	Tucker Payday Lender
Ten	Ameriloan
Eleven	United Cash Loans
Twelve	US FastCash
Thirteen	500 FastCash
Fourteen	One Click Cash

(Title 15, United States Code, Section 1611 and  
Title 18, United States Code, Section 2.)

#### **FORFEITURE ALLEGATIONS**

61. As a result of committing the offenses alleged in Counts One, Two, Three, and Four of this Indictment, SCOTT TUCKER and TIMOTHY MUIR, the defendants, shall forfeit to the



United States, pursuant to Title 18, United States Code, Section 1963, a sum of United States currency equal to at least \$2,000,000,000.00 in that such a sum represents (i) any interest acquired or maintained as a result of the offenses alleged in Counts One, Two, Three, and Four; (ii) any interest in, security of, claim against, or property or contractual right of any kind affording a source of influence over of any enterprise which the defendant has established, operated, controlled, conducted, or participated in the conduct of, as part of the offenses charged in Counts One, Two, Three, or Four; or (iii) any property, constituting or derived from, any proceeds obtained, directly or indirectly, from the unlawful collections of debt charged in Counts One, Two, Three, and Four, including, but not limited to:

- i. Any and all funds in account number 10840015031 in the name of BA Services LLC at Midwest Trust Company and any and all funds traceable thereto;
- ii. Any and all funds in account number 10840015021 in the name of Tucker Scott FI at Midwest Trust Company and any and all funds traceable thereto;
- iii. Any and all funds in account number 10840015041 in the name of Tucker Scott EQ at Midwest Trust Company and any and all funds traceable thereto;
- iv. Any and all funds in account number 10840015556 in the name of Scott Tucker LT FI at Midwest Trust Company and any and all funds traceable thereto;



- v. Any and all funds in account number 97363826 in the name of Kim Cunningham Tucker TTEE at Charles Schwab and any and all funds traceable thereto;
- vi. Any and all funds in account number 10840017641 in the name of Kim Tucker at Midwest Trust Company and any and all funds traceable thereto;
- vii. Any and all funds in account number 2727864 in the name of BA Services LLC - Operating Account at Welch Bank and any and all funds traceable thereto;
- viii. Any and all funds in account number 10840016009 in the name of Black Creek Capital LLC at Midwest Trust Company and any and all funds traceable thereto;
- ix. Any and all funds in account number 1218503 in the name of Level 5 Motorsports LLC at Capital City Bank and any and all funds traceable thereto;
- x. Any and all funds in account number 4026665 in the name of West Fund LLC at Freedom Bank and any and all funds traceable thereto;
- xi. Any and all funds in account number 18221313 in the name of Kim C. Tucker at Charles Schwab and any and all funds traceable thereto;
- xii. Any and all funds in account number 741003284 in the name of Stephanie R. Tucker Muir at Commerce Bank and any and all funds traceable thereto;
- xiii. Any and all funds in account number 35104126 in the name of Scott A. Tucker

- at Charles Schwab and any and all funds traceable thereto;
- xiv. Any and all funds in account number 597554 in the name of Scott A. Tucker POD Kim Tucker at First National Bank of Louisburg and any and all funds traceable thereto;
- xv. Any and all funds in account number 590957615 in the name of Tim J. Muir at Commerce Bank and any and all funds traceable thereto;
- xvi. Any and all funds in account number 4026053 in the name of West Fund LLC at Freedom Bank and any and all funds traceable thereto;
- xvii. Any and all funds in account number 4026061 in the name of West Fund LLC at Freedom Bank and any and all funds traceable thereto;
- xviii. Any and all funds in account number 13154972 in the name of Kim C. Tucker at Charles Schwab and any and all funds traceable thereto;
- xix. Any and all funds in account number 2727974 in the name of BA Services LLC - Payroll Account at Welch Bank and any and all funds traceable thereto;
- xx. Any and all funds in account number 735106896 in the name of Stephanie R. Tucker or Tim J. Muir at Commerce Bank and any and all funds traceable thereto;
- xxi. Any and all funds in account number 145591766784 in the name of AMG Capital Management LLC at US Bank and any and all funds traceable thereto;

- xxii. Any and all funds in account number 1218423 in the name of Level 5 Management LLC at Capital City Bank and any and all funds traceable thereto;
- xxiii. Any and all funds in account number 1218458 in the name of Level 5 Apparel LLC at Capital City Bank and any and all funds traceable thereto;
- xxiv. Any and all funds in account number 603325 in the name of ST Capital LLC at First National Bank of Louisburg and any and all funds traceable thereto;
- xxv. Any and all funds in account number 1218431 in the name of Level 5 Eyewear LLC at Capital City Bank and any and all funds traceable thereto;
- xxvi. Any and all funds in account number 1218466 in the name of Level 5 Scientific LLC at Capital City Bank and any and all funds traceable thereto;
- xxvii. Any and all funds in account number 1218474 in the name of Level 5 Capital Partners LLC at Capital City Bank and any and all funds traceable thereto;
- xxviii. All right, title and interest in real property located at 269 Park Avenue, Aspen CO 81611, with all improvements, appurtenances, and attachments thereon;
- xxix. All right, title and interest in real property located at 2405 W. 114th Street, Leawood, KS 66211, with all improvements, appurtenances, and attachments thereon;
- xxx. One Ferrari 599XX bearing VIN: ZFF69PXX000170883;
- xxxi. One 2011 Ferrari 599 GTO bearing VIN:

- ZFF70RCA2B0175653;
- xxxii. One 2011 Porsche Cayenne bearing VIN:  
WP1AE2A26BLA91678;
- xxxiii. One 2011 Ferrari 458 Challenge bearing  
VIN: ZFF71NXX000179226;
- xxxiv. One 2011 Ferrari 458 Challenge bearing  
VIN: ZFF71NXX000177700;
- xxxv. One 2011 Porsche 911 GT2 RS bearing  
VIN: WP0AE2A92BS778077;
- xxxvi. One 2011 Porsche Panamera Turbo bearing  
VIN: WP0AC2A71BL090988;
- xxxvii. One 2011 Ferrari SA Aperta bearing VIN:  
ZFF72RHA7B0181404;
- xxxviii. One 2005 Porsche Carrera GT bearing  
VIN: WP0CA29835L001261;
- xxxix. One 2014 Ferrari 458 bearing VIN:  
ZFF68NHA8E0196808;
- xl. One Model 60 Learjet bearing FAA  
Registration N551ST;

62. As a result of committing wire fraud and conspiracy to commit the same, as alleged in Counts Five and Six of this Indictment, SCOTT TUCKER and TIMOTHY MUIR, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, any and all property, real or personal, which constitutes or is derived from proceeds traceable to the commission of Counts Five and Six of the Indictment, including,

but not limited to, a sum of United States currency equal to at least \$2,000,000,000.00 representing the amount of proceeds traceable to the commission of said offenses and including, but not limited to, the following specific property:

- i. Any and all funds in account number 10840015031 in the name of BA Services LLC at Midwest Trust Company and any and all funds traceable thereto;
- ii. Any and all funds in account number 10840015021 in the name of Tucker Scott FI at Midwest Trust Company and any and all funds traceable thereto;
- iii. Any and all funds in account number 10840015041 in the name of Tucker Scott EQ at Midwest Trust Company and any and all funds traceable thereto;
- iv. Any and all funds in account number 10840015556 in the name of Scott Tucker LT FI at Midwest Trust Company and any and all funds traceable thereto;
- v. Any and all funds in account number 97363826 in the name of Kim Cunningham Tucker TTEE at Charles Schwab and any and all funds traceable thereto;
- vi. Any and all funds in account number 10840017641 in the name of Kim Tucker at Midwest Trust Company and any and all funds traceable thereto;
- vii. Any and all funds in account number 2727864 in the name of BA Services LLC - Operating Account at Welch Bank and any and all funds traceable thereto;
- viii. Any and all funds in account number 10840016009 in the name of Black Creek

Capital LLC at Midwest Trust Company and any and all funds traceable thereto;

- ix. Any and all funds in account number 1218503 in the name of Level 5 Motorsports LLC at Capital City Bank and any and all funds traceable thereto;
- x. Any and all funds in account number 4026665 in the name of West Fund LLC at Freedom Bank and any and all funds traceable thereto;
- xi. Any and all funds in account number 18221313 in the name of Kim C. Tucker at Charles Schwab and any and all funds traceable thereto;
- xii. Any and all funds in account number 741003284 in the name of Stephanie R. Tucker Muir at Commerce Bank and any and all funds traceable thereto;
- xiii. Any and all funds in account number 35104126 in the name of Scott A. Tucker at Charles Schwab and any and all funds traceable thereto;
- xiv. Any and all funds in account number 597554 in the name of Scott A. Tucker POD Kim Tucker at First National Bank of Louisburg and any and all funds traceable thereto;
- xv. Any and all funds in account number 590957615 in the name of Tim J. Muir at Commerce Bank and any and all funds traceable thereto;
- xvi. Any and all funds in account number 4026053 in the name of West Fund LLC at Freedom Bank and any and all funds traceable thereto;
- xvii. Any and all funds in account number 4026061 in the name of West Fund LLC at Freedom



Bank and any and all funds traceable thereto;

- xviii. Any and all funds in account number 13154972 in the name of Kim C. Tucker at Charles Schwab and any and all funds traceable thereto;
- xix. Any and all funds in account number 2727974 in the name of BA Services LLC - Payroll Account at Welch Bank and any and all funds traceable thereto;
- xx. Any and all funds in account number 735106896 in the name of Stephanie R. Tucker or Tim J. Muir at Commerce Bank and any and all funds traceable thereto;
- xxi. Any and all funds in account number 145591766784 in the name of AMG Capital Management LLC at US Bank and any and all funds traceable thereto;
- xxii. Any and all funds in account number 1218423 in the name of Level 5 Management LLC at Capital City Bank and any and all funds traceable thereto;
- xxiii. Any and all funds in account number 1218458 in the name of Level 5 Apparel LLC at Capital City Bank and any and all funds traceable thereto;
- xxiv. Any and all funds in account number 603325 in the name of ST Capital LLC at First National Bank of Louisburg and any and all funds traceable thereto;
- xxv. Any and all funds in account number 1218431 in the name of Level 5 Eyewear LLC at Capital City Bank and any and all funds traceable thereto;
- xxvi. Any and all funds in account number 1218466 in the name of Level 5 Scientific LLC at

Capital City Bank and any and all funds traceable thereto;

- xxvii. Any and all funds in account number 1218474 in the name of Level 5 Capital Partners LLC at Capital City Bank and any and all funds traceable thereto;
- xxviii. All right, title and interest in real property located at 269 Park Avenue, Aspen CO 81611, with all improvements, appurtenances, and attachments thereon;
- xxix. All right, title and interest in real property located at 2405 W. 114th Street, Leawood, KS 66211, with all improvements, appurtenances, and attachments thereon;
- xxx. One Ferrari 599XX bearing VIN: ZFF69PXX000170883;
- xxxi. One 2011 Ferrari 599 GTO bearing VIN: ZFF70RCA2B0175653;
- xxxii. One 2011 Porsche Cayenne bearing VIN: WP1AE2A26BLA91678;
- xxxiii. One 2011 Ferrari 458 Challenge bearing VIN: ZFF71NXX000179226;
- xxxiv. One 2011 Ferrari 458 Challenge bearing VIN: ZFF71NXX000177700;
- xxxv. One 2011 Porsche 911 GT2 RS bearing VIN: WP0AE2A92BS778077;
- xxxvi. One 2011 Porsche Panamera Turbo bearing VIN: WP0AC2A71BL090988;
- xxxvii. One 2011 Ferrari SA Aperta bearing VIN: ZFF72RHA7B0181404;
- xxxviii. One 2005 Porsche Carrera GT bearing VIN: WP0CA29835L001261;

xxxix. One 2014 Ferrari 458 bearing VIN:  
ZFF68NHA8E0196808;

xl. One Model 60 Learjet bearing FAA  
Registration N551ST;

63. As a result of committing the money laundering offenses alleged in Counts Seven through Nine of this Indictment, SCOTT TUCKER and TIMOTHY MUIR, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real or personal, involved in said offenses, or any property traceable to such property, including, but not limited to, a sum of United States currency equal to at least \$2,000,000,000.00 representing the amount of property involved in said offenses and including, but not limited to, the following specific property:

- i. Any and all funds in account number 10840015031 in the name of BA Services LLC at Midwest Trust Company and any and all funds traceable thereto;
- ii. Any and all funds in account number 10840015021 in the name of Tucker Scott FI at Midwest Trust Company and any and all funds traceable thereto;
- iii. Any and all funds in account number 10840015041 in the name of Tucker Scott EQ at Midwest Trust Company and any and all funds traceable thereto;
- iv. Any and all funds in account number 10840015556 in the name of Scott Tucker LT

- FI at Midwest Trust Company and any and all funds traceable thereto;
- v. Any and all funds in account number 97363826 in the name of Kim Cunningham Tucker TTEE at Charles Schwab and any and all funds traceable thereto;
  - vi. Any and all funds in account number 10840017641 in the name of Kim Tucker at Midwest Trust Company and any and all funds traceable thereto;
  - vii. Any and all funds in account number 2727864 in the name of BA Services LLC - Operating Account at Welch Bank and any and all funds traceable thereto;
  - viii. Any and all funds in account number 10840016009 in the name of Black Creek Capital LLC at Midwest Trust Company and any and all funds traceable thereto;
  - ix. Any and all funds in account number 1218503 in the name of Level 5 Motorsports LLC at Capital City Bank and any and all funds traceable thereto;
  - x. Any and all funds in account number 4026665 in the name of West Fund LLC at Freedom Bank and any and all funds traceable thereto;
  - xi. Any and all funds in account number 18221313 in the name of Kim C. Tucker at Charles Schwab and any and all funds traceable thereto;
  - xii. Any and all funds in account number 741003284 in the name of Stephanie R. Tucker Muir at Commerce Bank and any and all funds traceable thereto;
  - xiii. Any and all funds in account number 35104126 in the name of Scott A. Tucker at

Charles Schwab and any and all funds traceable thereto;

- xiv. Any and all funds in account number 597554 in the name of Scott A. Tucker POD Kim Tucker at First National Bank of Louisburg and any and all funds traceable thereto;
- xv. Any and all funds in account number 590957615 in the name of Tim J. Muir at Commerce Bank and any and all funds traceable thereto;
- xvi. Any and all funds in account number 4026053 in the name of West Fund LLC at Freedom Bank and any and all funds traceable thereto;
- xvii. Any and all funds in account number 4026061 in the name of West Fund LLC at Freedom Bank and any and all funds traceable thereto;
- xviii. Any and all funds in account number 13154972 in the name of Kim C. Tucker at Charles Schwab and any and all funds traceable thereto;
- xix. Any and all funds in account number 2727974 in the name of BA Services LLC - Payroll Account at Welch Bank and any and all funds traceable thereto;
- xx. Any and all funds in account number 735106896 in the name of Stephanie R. Tucker or Tim J. Muir at Commerce Bank and any and all funds traceable thereto;
- xxi. Any and all funds in account number 145591766784 in the name of AMG Capital Management LLC at US Bank and any and all funds traceable thereto;
- xxii. Any and all funds in account number 1218423 in the name of Level 5 Management LLC at

- Capital City Bank and any and all funds traceable thereto;
- xxiii. Any and all funds in account number 1218458 in the name of Level 5 Apparel LLC at Capital City Bank and any and all funds traceable thereto;
- xxiv. Any and all funds in account number 603325 in the name of ST Capital LLC at First National Bank of Louisburg and any and all funds traceable thereto;
- xxv. Any and all funds in account number 1218431 in the name of Level 5 Eyewear LLC at Capital City Bank and any and all funds traceable thereto;
- xxvi. Any and all funds in account number 1218466 in the name of Level 5 Scientific LLC at Capital City Bank and any and all funds traceable thereto;
- xxvii. Any and all funds in account number 1218474 in the name of Level 5 Capital Partners LLC at Capital City Bank and any and all funds traceable thereto;
- xxviii. All right, title and interest in real property located at 269 Park Avenue, Aspen CO 81611, with all improvements, appurtenances, and attachments thereon;
- xxix. All right, title and interest in real property located at 2405 W. 114th Street, Leawood, KS 66211, with all improvements, appurtenances, and attachments thereon;
- xxx. One Ferrari 599XX bearing VIN:  
ZFF69PXX000170883;
- xxxi. One 2011 Ferrari 599 GTO bearing VIN:  
ZFF70RCA2B0175653;
- xxxii. One 2011 Porsche Cayenne bearing VIN:



WP1AE2A26BLA91678;

xxxiii. One 2011 Ferrari 458 Challenge bearing VIN:  
ZFF71NXX000179226;

xxxiv. One 2011 Ferrari 458 Challenge bearing VIN:  
ZFF71NXX000177700;

xxxv. One 2011 Porsche 911 GT2 RS bearing VIN:  
WPOAE2A92BS778077;

xxxvi. One 2011 Porsche Panamera Turbo bearing  
VIN: WPOAC2A71BL090988;

xxxvii. One 2011 Ferrari SA Aperta bearing VIN:  
ZFF72RHA7B0181404;

xxxviii. One 2005 Porsche Carrera GT bearing VIN:  
WPOCA29835L001261;

xxxix. One 2014 Ferrari 458 bearing VIN:  
ZFF68NHA8E0196808;

xl. One Model 60 Learjet bearing FAA  
Registration N551ST;

**Substitute Asset Provision**

64. If any of the above-described forfeitable property, as  
a result of any act or omission of the defendant:

(i) cannot be located upon the exercise of due  
diligence;

(ii) has been transferred or sold to, or deposited  
with, a third person;

(iii) has been placed beyond the jurisdiction of the  
Court;

(iv) has been substantially diminished in value; or

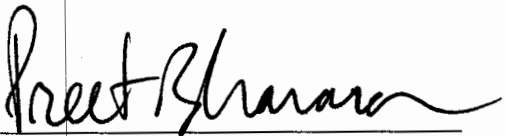
(v) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Sections 981, 982 and 1963(m), Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461, to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

(Title 18, United States Code, Sections 981, 982 and 1963; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)



FOREPERSON



PREET BHARARA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

---

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

UNITED STATES OF AMERICA

- v. -

SCOTT TUCKER and  
TIMOTHY MUIR

Defendants.

---

SUPERSEDING  
INDICTMENT

S1 16 Cr. 91 (PKC)

(18 U.S.C. §§ 1343, 1349,  
1956, 1962, 1963, and 2.)  
(15 U.S.C. § 1611)

PREET BHARARA

United States Attorney.

A TRUE BILL



Foreperson.

---

11/30/16 FILED SUPERSEDING INDICTMENT  
COTT, SMT